

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON – SEATTLE DIVISION**

In re STEFANIA J. RAMOS BIRCH,)	
)	
Subpoena,)	Cause No. 2:22-cv-01477-JLR
-----)	
LOZANO et. al.,)	Judge James L. Robart
)	
Plaintiffs)	
)	
DOES I-X et. al.,)	
)	
Defendants		

**DECLARATION OF STEFANIA JOANNE RAMOS BIRCH ESQ.
IN SUPPORT OF REPLY OF MOVANT STEFANIA J. RAMOS BIRCH**

I, Stefania Joanne Ramos Birch Esq., declare:

1. My name is Stefania Joanne Ramos Birch¹, and I am an attorney residing in the State of Washington, licensed in the States of Washington and California. I am a legal practitioner in good standing in both jurisdictions to which I am licensed. I am submitting this second declaration in support of my pending Motion to Quash Third-Party Subpoena and for a Protective Order, filed on September 30, 2022.
2. The underlying Complaint was filed on August 10, 2022 in the Southern District of Ohio, *Lozano, et al. v. Doe, et al.*, 2:22-cv-03089.
3. Plaintiffs in the underlying matter are: Alexandra Lozano (“Plaintiff Lozano”), an immigration attorney licensed in and residing in the State of Washington; Angelyne Lisinski (“Plaintiff Lisinski”), an immigration attorney licensed in and residing in the State

¹ Please note that my last name is “Ramos Birch” and not “Birch” as incorrectly indicated in the Plaintiffs’ reply.

of Ohio; and Giulia Fantacci (“Plaintiff Fantacci”), an immigration attorney licensed in and residing in the State of Florida. Plaintiffs are represented by Kristen R. Fraser (“Ms. Fraser”) of Organ Law LLP.

4. In response to my Motion to Quash, Plaintiffs submitted a response on October 17, 2022 requesting that my motion be denied accompanied by a declaration by their legal counsel.
5. After receipt of my motion, Plaintiffs’ counsel filed a subsequent discovery motion before the Ohio court specifically requesting that document discovery be permitted for the third-party non-defendants (as my Motion to Quash highlighted that the underlying discovery order by the Ohio court did not permit document discovery of third-party non-defendants and was limited in scope to depositions only). On October 24, 2022, the Ohio court denied Plaintiffs’ discovery motion without prejudice.
6. In response, on October 24, 2022, counsel for Plaintiffs filed a “Notice to the Court” agreeing to withdraw their request for documents from me, and requested that the remainder of my motion be denied and that I be ordered to sit for a deposition at the end of my maternity leave.
7. As previously indicated in my declaration and in my motion, I have no knowledge of the identity or identities of the people, persons, or entities responsible for the conduct alleged in the Plaintiffs’ Complaint. While I have clients who have consulted with Plaintiff Lozano in the past and have spoken to me about her legal advice as well as her business practices, any such disclosures by these clients to me and my office or their identities would be protected from discovery as covered by attorney-client privilege.
8. Therefore, there is no legitimate basis for Plaintiffs’ counsel to undertake my deposition as they are fully aware of what my testimony would be in a deposition as well as what is non-

disclosable as protected by attorney-client privilege. Any such deposition is unnecessary and superfluous. Plaintiff's counsel has received my motion and declaration, is aware that I do not have knowledge of the alleged John Doe defendants, and has not indicated in their "Notice to the Court" why such deposition is otherwise necessary. Rather, Plaintiffs' counsel should direct their energy and resources towards third-parties who actually have information responsive to their Complaint.

9. Therefore, my Motion to Quash should be granted and any subpoena for a deposition issued against me should be rescinded.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Executed on October 24, 2022, in Lynnwood, Washington.

STEFANIA J. RAMOS BIRCH ESQ.
Declarant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 24, 2022, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system and was served on all counsel of record.

/s/ Stefania J. Ramos Birch
Pro Se